

holding area. Chemical Waste Management has been contracted to lab-pack the waste, prepare the waste manifests, transport the waste to the Chemical Waste Management hazardous waste facility in Arlington, Oregon, and properly manage and dispose of the waste. Concrete confirmation sampling described in Appendices F and G will include PCB laboratory analysis to identify presence of PCBs in the concrete floors, walls, and supports. PCBs are not regulated under RCRA. However, CFAC may crush the concrete from the ground level floor, supports and other concrete structures to be used later as fill material. The regulatory levels that will determine what can be used as fill material will be made under a different regulatory program. Authorization of the material used for fill is outside the parameters of this WMP.

2.1.4 Nonhazardous Waste

All waste debris and dust collected from the basement and concrete from the basement, ground floors, walls, and battery room floor will be sampled and analyzed for RCRA 8 metals, total cyanide, fluoride, and PCBs, following the procedures in the SAP (Appendix F) and the QAPP (Appendix G). Nonhazardous waste will be transported to a licensed landfill for disposal. Motor oil, hydraulic fluids, non-regulated and transformer oil will be packed and disposed of by Emerald Recycling and Disposal, a licensed oil recycler, following the requirements of 40 CFR §279 for used oil. The waste will be left in its original packaging or drummed in proper Department of Transportation shipping containers. It will be transported to a central accumulation area in the casting plant until Emerald Recycling and Disposal disposes of or recycles the waste.

2.1.5 Reusable Material

Steel, iron, aluminum, copper, concrete, and carbon will be reused, repurposed or recycled as described in the Report in Appendix B (Tetra Tech 2016). Scrap metals are not regulated under RCRA, however, waste material may have collected on scrap metals. The Report (Tetra Tech 2016) in Appendix B addresses waste determination procedures for the scrap metals. Details on the sale of the anode carbon and aluminum heel sampling are provided below.